

**REMARKS**

Applicants submit this Amendment in response to the non-final Office Action mailed September 8, 2006. Applicants respectfully traverse all pending objections and rejections and request reconsideration of the application, as amended.

Claims 1-3, 7-9, 13-15, and 19-33 are currently pending, of which claims 1, 7, and 13 are independent. Applicants have canceled claims 4-6, 10-12, and 16-18 without prejudice and have amended claims 1, 7, and 13-15, and have added new claims 19-33.

The Examiner rejected claims 1-18 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Examiner further rejected claims 1-18 under 35 U.S.C. § 112, ¶ 2, because various claim terms were considered to be indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. Finally, the Examiner rejected claims 1-18 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,865,713 to Bates et al. ("Bates"). Applicants respectfully traverse the pending rejections for at least the reasons discussed below.

**35 U.S.C. § 101 Rejections**

The Examiner rejected claims 1-18 under 35 U.S.C. § 101 because "[t]he claim invention does not produce a useful [result] because the method does not meet the requirement as recited in the preambles, e.g., *providing navigation within an application.*" (emphasis in original)

Applicants have amended the independent claims 1, 7, and 13 to recite steps for providing navigation to a user-selected application view within an application. Specifically, the independent claims, as presently amended, recite, for example,

“receiving a first data input from the user of the application, the first data input corresponding to a first application view selected by the user,” “determining a target application context whose predefined set of application views includes the first application view selected by the user,” “displaying, prior to displaying the first application view selected by the user, a plurality of user-selectable elements associated with one or more application views in the target application context,” “receiving a second data input from the user, the second data input corresponding to a user-selectable element selected by the user and associated with a second application view in the target application context,” and “displaying, in response to receiving the second data input, the second application view to the user without first displaying the first application view.”

Applicants respectfully submit that the independent claims 1, 7, and 13, as amended, recite the above-noted steps for providing navigation in an application. The pending dependent claims 2-3, 8-9, 14-15, and 19-33 also include these recitations by nature of their dependencies. Accordingly, Applicants submit that the pending rejections under 35 U.S.C. § 101 should be removed.

**35 U.S.C. § 112, ¶ 2 Rejections**

The Examiner has rejected claim 1 under 35 U.S.C. § 112, ¶2 because the phrases “the plurality of contexts” and “different one” allegedly render the claim indefinite. In this response, Applicants have amended claim 1 to remove the phrases “the plurality of contexts” and “different one,” thereby obviating the pending indefiniteness rejections of claim 1.

Regarding claims 1, 6, 7, 12, 13, and 18, the Examiner rejected these claims under 35 U.S.C. § 112, ¶2 because the phrase “a primary process” allegedly renders

the claims indefinite. The claims have been amended to remove the phrase “a primary process.” Accordingly, the pending 35 U.S.C. § 112, ¶2 rejections of claims 1, 6, 7, 12, 13, and 18 should be withdrawn.

### **35 U.S.C. § 102(e) Rejections**

Applicants respectfully traverse the rejections of independent claims 1-18 under 35 U.S.C. § 102(e) as being anticipated by Bates. In order to properly establish an anticipation rejection under 35 U.S.C. § 102(e), each and every element of the claims at issue must be found in the applied reference, either expressly or under principles of inherency. Furthermore, “[t]he identical invention must be shown in as complete detail as is contained in the ... claim.” See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236; 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). In this case, Bates fails to disclose each and every element of the Applicants’ claimed invention.

Representative independent claim 1, as amended, calls for a combination including, for example, an “application comprising a plurality of application contexts, each application context having a predefined set of application views capable of being displayed to a user of the application,” “determining a target application context whose predefined set of application views includes the first application view selected by the user,” “displaying, prior to displaying the first application view selected by the user, a plurality of user-selectable elements associated with one or more application views in the target application context,” “receiving a second data input from the user, the second data input corresponding to a user-selectable element selected by the user and associated with a second application view in the target application context,” and

“displaying, in response to receiving the second data input, the second application view to the user without first displaying the first application view.” Applicants respectfully submit that Bates fails to teach or suggest at least the above-noted claim recitations in Applicants’ amended claim 1. For at least this reason, Bates is legally precluded from anticipating this claim under 35 U.S.C. § 102(e).

Bates teaches “annotation of a hypertext document with one or more comments.” Bates, Abstract. The “comments may be created by the user, thus functioning as reminders for the user about particular documents that the user has viewed before.” Id., col. 3, ll. 49-52. Alternatively, “[c]omments for a particular user may also be created by others, and shared with the user so that the user can rely on the experiences of others to determine the relative worth of previously unexplored documents.” Id., col. 4, ll. 7-9.

Bates differs from Applicants’ claim 1 in several respects. Most notably, Bates does not teach or suggest at least an “application comprising a plurality of application contexts, each application context having a predefined set of application views capable of being displayed to a user of the application,” as recited in Applicants’ amended independent claim 1. Bates also fails to teach or suggest at least “determining a target application context whose predefined set of application views includes the first application view selected by the user,” “a second application view in the target application context,” and “displaying... the second application view to the user without first displaying the first application view,” as claimed.

A. Bates fails to teach or suggest at least an “application comprising a plurality of application contexts,” as recited in claim 1.

Among other things, Bates fails to teach or suggest at least an “application comprising a plurality of application contexts, each application context having a predefined set of application views capable of being displayed to a user of the application,” as recited in Applicants’ amended claim 1. Instead, Bates is concerned with annotating user comments to individual hypertext documents. See, e.g., Bates, col. 3, ll. 17-19 (“providing an apparatus, program product, and method that support the annotation of a hypertext document with one or more comments”). For example, as shown in FIG. 3 of Bates, a comment data structure 42 stores a separate linked list 46 of comment text 56 for each individual hypertext document (addressed by a URL 48). See also Bates, col. 7, ll. 50-60. Since the comment data structure 42 maintains a separate comment list 46 for each hypertext document, the comment data structure does not arrange its documents as an “application comprising a plurality of application contexts, each application context having a predefined set of application views,” as recited in Applicants’ amended claim 1.

In short, Bates does not appear to teach or suggest grouping individual hypertext documents into a “predefined set of application views,” since such groupings would be unnecessary for Bates’s express purpose of annotating comments for an individual document. See Bates, Title (“Annotating A Hypertext Document With Comments”). Similarly, Bates also does not appear to group the hypertext documents into “a plurality of application contexts,” as claimed. Indeed, the concept of “a plurality of application contexts” appears to be entirely absent from the Bates disclosure.

- B. Bates fails to teach or suggest at least “displaying... the second application view to the user without first displaying the first application view,” as recited in claim 1.

FIG. 13 in Bates discloses a technique for navigating from a first hypertext document to a second hypertext document. In FIG. 13, a comment text 56 associated with a first hypertext document 70 includes a hypertext link 234 that directs a user to a second hypertext document. Although Bates discloses a technique for a user to navigate from the first hypertext document to the second, Bates fails to disclose whether the first and second documents are related, if at all. For instance, Bates is completely silent regarding whether the first and second hypertext documents belong to a common “target application context,” as claimed. Bates also fails to disclose whether the first and second documents are grouped in “a predefined set of application views,” as recited in Applicants’ claim 1. As a result, the navigation technique taught in FIG. 13 of Bates cannot teach or suggest at least the Applicants’ claimed steps of “determining a target application context whose predefined set of application views includes the first application view selected by the user,” “a second application view in the target application context,” and “displaying... the second application view to the user without first displaying the first application view.”

In addition, Applicants further submit that because Bates fails to teach or suggest “providing navigation within an application, the application comprising a plurality of application contexts, each application context having a predefined set of application views capable of being displayed to a user of the application,” (see supra, Section A), Bates likewise cannot teach or suggest at least the steps of “determining a target application context whose predefined set of application views includes the first

application view selected by the user,” “displaying, prior to displaying the first application view selected by the user, a plurality of user-selectable elements associated with one or more application views in the target application context,” “receiving a second data input from the user, the second data input corresponding to a user-selectable element selected by the user and associated with a second application view in the target application context,” and “displaying, in response to receiving the second data input, the second application view to the user without first displaying the first application view,” as recited in Applicants’ amended claim 1.

Based on the foregoing, Applicants respectfully submit that independent claim 1, as amended, is allowable over the art of record. Amended independent claims 7 and 13, although different in scope, recite language similar to independent claim 1 and are thus also allowable for at least the same reasons. Claims 1-3, 7-9, 13-15, and 19-33 depend on independent claims 1, 7, or 13 and are therefore allowable for at least the same reasons.

### **Conclusion**

The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability.

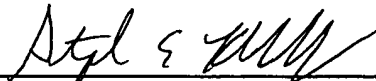
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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